

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Amendment of Section 73.202(b)	)	
Table of Allotments,	)	MB Docket No. 02-12
FM Broadcast Stations,	)	RM-10356
(Ash Fork, Chino Valley, Dolan Springs,	)	RM-10551
Fredonia, Gilbert, Peach Springs, Seligman, and	)	RM-10553
Tusayan, Arizona; Moapa Valley, Nevada; Beaver	)	RM-10554
and Cedar City, Utah)	)	
	)	

To The Commission

**RESPONSE**

Entravision Holdings, LLC ("Entravision"), licensee of Station KRRN(FM), Dolan Springs, Arizona ("KRRN"), by its counsel, hereby submits this Response to the Petition for Reconsideration ("Petition") filed by NPR Phoenix, LLC and Prescott Radio Partners (jointly the "Petitioners") in connection with the *Report and Order*, in MB Docket No. 02-12, DA 03-3748, released November 26, 2003 ("*R&O*"). In support thereof, Entravision states as follows.

As set forth in the *R&O*, the previous licensee of KRRN, Spectrum Scan, LLC ("Spectrum Scan"), submitted a Counterproposal in MM Docket No. 02-12. The reallocation of KRRN, Channel 224C, from Dolan Springs, Arizona to Moapa Valley, Nevada was an integral component of Spectrum Scan's Counterproposal. Upon becoming the licensee of KRRN,<sup>1</sup> Entravision indicated its commitment to pursuing the reallocation proposal originally advanced by Spectrum Scan. See *R&O* at ¶ 6, n. 7.

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<sup>1</sup> Entravision was assigned the KRRN license pursuant to Commission consent in File No. BAPLH-20020705AAF

In the Petition, Petitioners take issue with the *R&O*'s failure to adopt certain proposed changes put forward by Petitioners. Entravision does not seek to comment on the merits of either the reasoning in the *R&O* that denied Petitioners' proposed changes, or Petitioners' challenge thereto. Instead, Entravision wishes to clarify, on the record, that Petitioner's Petition of the *R&O* does not call into question or seek the reversal of the Media Bureau's decision to reallocate FM Channel 224C from Dolan Springs, Arizona to Moapa Valley, Nevada and to modify KRRN's license to specify Moapa Valley as the Station's community of license. In fact, as Petitioners state, "the FCC ***must not*** undo the Moapa Valley relicensing." Petition at 18.

Whatever action the Commission may take on the Petition, Entravision submits that such action should not implicate or affect the FM Channel 224C allotment change. The Channel 224C change was originally predicated on the need to accommodate other aspects of Spectrum Scan's Counterproposal and was correctly granted in the *R&O*. As the Media Bureau noted therein, the Channel 224C reallocation will provide Moapa Valley with a second local service without depriving Dolan Springs of local service. *See R&O* at ¶ 6. This change thus furthers the Commission's FM allotment priorities and serves the public interest. Neither the application of the Commission's rules and policies as to counterproposals, as described in the *R&O*, nor the arguments of the Petitioners, provide any basis to the contrary. Hence the *R&O*, as it relates to the FM Channel 224C reallocation, should remain unaltered.

Wherefore, for the foregoing reasons, Entravision Holdings, LLC, licensee of Station KRRN(FM), Dolan Springs, Arizona, respectfully requests that the Commission recognize that the Petitioners' Petition does not and should not affect the Media Bureau's correct decision to reallocate KRRN, Channel 22.4C from Dolan Springs, Arizona to Moapa Valley, Nevada and to modify KRRN's license to specify Moapa Valley as the Station's community of license.

Respectfully submitted,

**ENTRAVISION HOLDING, LLC**

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March 2, 2004

## CERTIFICATE OF SERVICE

I, Barry A. Friedman, do hereby certify that I have, on this 2<sup>nd</sup> day of March, 2004, served a copy of the foregoing, "Response," by first-class mail, postage prepaid, on the following parties.

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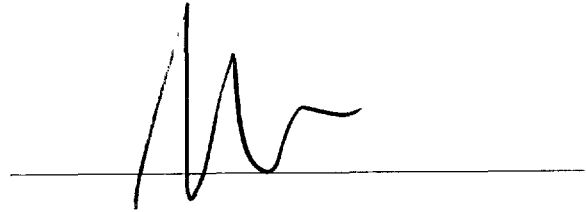
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A handwritten signature in black ink, appearing to read 'John A. Karousos', is written over a horizontal line.

\* By Hand